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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

--X

ROYAL SUN ALLIANCE INSURANCE PLC,

Plaintiff,

-against-

UPS SUPPLY CHAIN SOLUTIONS, INC., WORLDWIDE DEDICATED SERVICES, INC., and INTERNATIONAL MANAGEMENT SERVICES COMPANY, INC., et al.

Defendants.

--X

ECF CASE

09 Civ. 5935 (LTS)

NOTICE OF DEFENDANTS' MOTION *IN LIMINE* TO PRECLUDE THE EXPERT TESTIMONY OF RICHARD P. MILLMAN, M.D.

PLEASE TAKE NOTICE that Defendants INTERNATIONAL MANAGEMENT SERVICES COMPANY, INC. and TFE LOGISTICS (collectively, "IMSCO"), through undersigned counsel, moves this Court before the Honorable Laura Taylor Swain, United States District Court Judge, in the United States Courthouse, 500 Pearl Street, New York, New York, 10013, for an order to Preclude the expert testimony of Richard P. Millman, M.D.

In support of the motion, Defendant IMSCO will rely on the accompanying Declaration of Bruce A. Lindsay, Esq., the accompanying Memorandum of Law and all prior proceedings herein.

Pursuant to your Honor's Individual Practices, Bruce Lindsay, counsel for IMSCO pro hac vice, used his best efforts to informally resolve the matters raised herein, including a detailed written exchange with Plaintiff's counsel, but was unable to resolve the matter. Mr. Lindsay's Certification on this point appears on page 2 of the accompanying Memorandum of Law.

Dated: New York, New York
February 14, 2011

DEORCHIS & PARTNERS, LLP
Attorneys for Defendant IMSCO

By: /s/ Vincent M. DeOrchis

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TO:

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Attention: Jacqueline M. James, Esq.
Thomas M. Eagan, Esq.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 14, 2011, I electronically filed the foregoing documents: Notice of Motion; Declaration of Bruce A. Lindsay, Esq. in support of Motion; Memorandum of Law in Support of Defendants International Management Services Company, Inc. and TFE Logistics Groups, Inc. (collectively "IMSCO") in Support of Defendants' Motion in Limine to Preclude Expert Testimony of Richard P. Millman, M.D., with the Clerk of the Court using CM/ECF, I also certify that a true and correct copy of the foregoing documents are being electronically serviced this day on all counsel of record through the CM/ECF System.

DEORCHIS & PARTNERS, LLP
Attorneys for Defendant
UPS Supply Chain Solutions, Inc.

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